

# Maksim Nemtsev, P.C.

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February 21, 2024

## VIA ECF

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Application Granted.** Defendant is permitted to travel to Albania on February 29, 2024, and must return to the United States no later than March 12, 2024. Defendant shall provide his probation officer with his itinerary in advance of any travel. The Clerk of the Court is directed to terminate the letter motion at docket number 88.

Dated: February 23, 2024  
New York, New York



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

**RE: *United States v. Enald Beqiraj, Docket No. 21-cr-656 (LGS)***

Request to Permit Travel to Albania to Visit Ailing Grandparent from Feb. 29 to Mar. 12

Dear Judge Schofield:

I am an attorney for Enald Beqiraj and respectfully request this Honorable Court to permit Mr. Beqiraj to travel to Albania for two-weeks from February 29 to March 12 so that he can visit his grandfather who is suffering from senile dementia and whose condition has recently worsened. This Honorable Court denied a similar request while Mr. Beqiraj was on conditions of pre-trial release, *see Dkt. 43*. Since then, Mr. Beqiraj has been sentenced, has served his term of imprisonment, and is now serving his term of supervised release. Mr. Beqiraj has made the required restitution payments under the terms specified by the Probation Office and has completed his mental health assessment. He is in the process of finding employment and expects, based on a formal job offer, that he will be able to rejoin his prior employer starting on March 18, 2024.

Mr. Beqiraj's grandfather, who raised Mr. Beqiraj as a child, was diagnosed with senile dementia and other medical conditions years ago.<sup>1</sup> Mr. Beqiraj's mother, who is already in Albania, reports that his condition is worsening. A letter from Mr. Beqiraj detailing the significance of this trip for him is attached as Exhibit 1.

Mr. Beqiraj's Probation Officer, Carolina Aparicio-Santiago, notified the undersigned that Mr. Beqiraj is compliant with all the terms of his supervised release, including his restitution and mental health counseling obligations, but that the Probation Office opposes the travel request because Mr. Beqiraj does not have current employment and that any funds spent on the trip should be paid towards restitution. In response, the defense respectfully states that Mr. Beqiraj has diligently searched for employment for the last three months and has not received any offers other than the offer from his prior employer, the start date of which will not be

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<sup>1</sup> Medical records confirming the diagnoses have been submitted to the Probation Office. If this Honorable Court requires the medical records, we respectfully request that the records relating to Mr. Beqiraj's grandfather be filed under seal.

impacted by this trip. Mr. Beqiraj completes job applications through the internet and will continue to apply during the duration of this trip. Furthermore, Mr. Beqiraj's plane ticket was paid for by his mother and his expenses during the trip (where he will be staying at the family's home in Albania) are not expected to exceed his basic living expenses in the United States. AUSA Kedar Bhatia has moved to the U.S. Attorney's Office in Los Angeles and no AUSA is presently assigned to this case. If this Honorable Court requires the government's position, the defense will request that a prosecutor from U.S. Attorney's Office in SDNY be assigned.

We appreciate Your Honor's attention and consideration

Respectfully,

Maksim Nemtsev

CC: Carolina Aparicio-Santiago  
United States Department of Probation (by email)

Dear Judge Schofield,

I am writing to request permission to travel to Albania to visit my grandfather, who is suffering from senile dementia. This trip holds profound significance for me, as my grandfather was one of the people that raised me. Regrettably, opportunities to spend time with him have been scarce over the years. With each passing day, his health deteriorates, and his memory fades, underscoring the urgency to be by his side, alongside my parents, during this challenging time.

I assure you that my proposed visit to Albania will not impede upon my personal responsibilities or obligations. Throughout my supervised release period, I have remained steadfast in fulfilling all requirements, collaborating closely with my probation officer to uphold my commitments.

Your understanding and compassion regarding this matter would be deeply appreciated.

Thank you for your attention to this request.

Sincerely,  
Enald Beqiraj